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August 24, 2016

AUG 24 2016

Federal Communications Commission
Office of the Secretary

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

**Re: Section 63.71 Application of Section 63.71 Application of Verizon Maryland LLC,
Verizon New England Inc., Verizon New Jersey Inc., Verizon New York Inc.,
Verizon Pennsylvania LLC, and Verizon Virginia LLC**

Dear Ms. Dortch:

The Verizon incumbent local exchange companies captioned above (collectively "Verizon") submit the enclosed Application for authority under Section 214(a) of the Communications Act and 47 C.F.R. § 63.71 to grandfather five legacy interstate DS0 services in multiple wire centers.¹ Existing customers may continue to receive these same legacy DS0 services over Verizon's more advanced and reliable fiber facilities; or, may switch to another product offering or service that better fits their needs.

Very truly yours,

Enclosure

cc: Department of Defense Chief Information Officer
Governor of Each Impacted State
Public Utilities Commission for Each Impacted State

¹ These legacy voice and low-speed data services are Voice Grade Service, WATS Access Line Service, Bonded Digital Link Service, Digital Data Service, and DIGIPATH Digital Service II. A list of the affected wire centers is included in the Application at Exhibit A.

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Section 63.71 Application of Verizon)	
Maryland LLC, Verizon New England)	
Inc., Verizon New Jersey Inc., Verizon)	
New York Inc., Verizon Pennsylvania)	
LLC, and Verizon Virginia LLC)	File No. _____
)	
For Authority Pursuant to Section 214 of)	
the Communications Act of 1934, As)	
Amended To Discontinue the Provision of)	
Service)	

**SECTION 63.71 APPLICATION OF CERTAIN
VERIZON INCUMBENT LOCAL EXCHANGE COMPANIES**

The Verizon incumbent local exchange companies captioned above (collectively “Verizon”) submit this Application for authority under Section 214(a) of the Communications Act and Section 63.71 of the Commission’s rules to grandfather five legacy interstate DS0 services in multiple wire centers.¹ Once grandfathered, these existing customers will continue to receive these same legacy DS0 services but over Verizon’s more advanced and reliable fiber facilities rather than copper facilities. Customers may also choose to switch to another product offering or service that better fits their needs.

Verizon is migrating these wire centers to all-fiber facilities in a multi-stage process. Many of the customers in these areas have already made the decision to move to our fiber-based services or to competitors’ services; others are in the process of transitioning. Completing the transition in these areas is not just a logical and an efficient step, but an incremental one.

¹ These legacy voice and low-speed data services are Voice Grade Service, WATS Access Line Service, Bonded Digital Link Service, Digital Data Service, and DIGIPATH Digital Service II. A list of the affected wire centers is included at Exhibit A.

During this transition, we have been working one-on-one with our customers receiving service over copper facilities to discuss their existing services and their needs going forward. For the vast majority of these customers, there has been a like-for-like, fiber-based service available for them, making this transition straightforward. Most of these customers are purchasing plain old telephone service (POTS) from us. These POTS customers will continue to receive the same POTS service over fiber at the same or better price, and there is no change in the underlying features and functionalities in their service. For those customers purchasing broadband Internet services over copper facilities, Fios Internet will provide them far more than they are getting today. Notwithstanding the greater speed and reliability they will experience, our offerings for these customers will also include comparable pricing. Similarly, customers will continue to be able to buy DS1 level services as they do today, just over the more reliable network.²

In our conversations with customers, we have identified a small number of legacy interstate special access services – Voice Grade Service, WATS Access Line Service, Bonded Digital Link Service, Digital Data Service, and DIGIPATH Digital Service II – which no longer serve a substantial need for the majority of our customers. These services are outdated voice and data transmission services that have largely fallen out of favor as customers have chosen new options and technologies. Indeed, we currently have no customers on Bonded Digital Link; only two customers on WATS; and fewer than three hundred in total in these areas on DDS, Digipath, and Voice Grade. While we are able to support these services for the small number of existing customers and circuits, given the decreased demand for these outdated services, we will

² Higher level services are today already regularly provisioned over fiber facilities and customers will continue to be able to buy them.

grandfather those services here, preventing new customers from ordering them. Existing customers may continue to submit orders for moves, adds, or changes.

Consistent with 63.71(a) and (b) of the Commission's rules, Verizon provides the following information:

1. Name and Address of Carrier (47 C.F.R. §§ 63.71 (a)(1), (b)(2)):

Verizon Maryland LLC
1 East Pratt Street
Baltimore, MD 21202

Verizon New England Inc.
125 High Street - Oliver Tower 7th Floor
Boston, MA 02110

Verizon New Jersey Inc.
540 Broad Street
Newark, NJ 07102

Verizon New York Inc.
140 West Street
New York, NY 10007

Verizon Pennsylvania LLC
1717 Arch Street
Philadelphia, PA 19103

Verizon Virginia LLC
22001 Loudoun County Parkway
Ashburn, VA 20147

2. Date of Planned Service Discontinuation (47 C.F.R. §§ 63.71(a)(2), (b)(2)):

Subject to the Commission's authorization, on or after November 22, 2016, Verizon will stop accepting new orders for Voice Grade Service, WATS Access Line Service, Bonded Digital Link Service, Digital Data Service, and DIGIPATH Digital Service II in the affected wire

centers.³ Existing customers may retain their grandfathered service in accordance with the terms of the applicable tariffs and this application until such time as they choose to cancel the service or until Verizon seeks and receives permission to discontinue offering the service. Existing customers will be permitted to make orders for moves, adds, or changes to these services.

3. Points of Geographic Areas of Service Affected (47 C.F.R. §§ 63.71(a)(3), (b)(2)):

Subject to the Commission's authorization, Verizon intends to grandfather the aforementioned services in the wire centers listed in Exhibit A.

4. Brief Description of Type of Service Affected (47 C.F.R. §§ 63.71(a)(4), (b)(2)):

The services at issue here are all legacy voice and very low-speed data transmission services. Customers today can obtain alternative services and products from Verizon or other providers that perform the same functions as these services, including fiber-based Voice Service, Fiber to the Internet Service or Fios Internet, Switched Ethernet Service, Private Internet Protocol Service, DS1 Service, and Machine-to-Machine Service. Specifically, the five services here are:

Voice Grade Service uses dedicated lines to provide voice frequency transmission capability for connecting location-to-location or to the public network. Voice Grade Service terminations transmit in the nominal frequency range of 300 to 3000 Hz. It may be terminated as analog two-wire or four-wire. Voice Grade channels are provided between customer designated premises or between a customer designated premises and a Verizon hub. Voice Grade Service is further described in Verizon's FCC Tariff No.1, Sec. 7.2.3 and Verizon's FCC Tariff No. 11, Sec. 7.2.3.

³ Please see Exhibit A for a list of the specific affected wire centers. Subject to the Commission's authorization, on or after November 22, 2016, Verizon intends to file tariff revisions on 15 days' notice to effect the grandfathering of these services.

WATS Access Line Service provides voice frequency transmission capability for toll free calling in a limited geographic area. The service provides a customer premise to customer premise connection with the combination of WATS Access Connection (WAC), a dedicated channel between the customer's end user's premises and a WATS Serving Office (WSO) equipped with a Switched Access Service arrangement. WATS Access Line Service is further described in Verizon's FCC Tariff No. 1, Sec. 7.2.3.1 and Verizon's FCC Tariff No. 11, Sec. 7.2.10.

Bonded Digital Link Service provides connecting channels for the transmission of voice or data between an end user's local exchange service terminating at a digital cross connect facility and special access service provided by Verizon within the same wire center or at another wire center within the same LATA. Bonded Digital Link Service is further described in Verizon's FCC Tariff No. 1, Sec. 7.2.8.1 and Verizon's FCC Tariff No. 11, Sec. 7.2.21.

Digital Data Service provides duplex transmission of synchronous serial data at 2.4, 4.8, 9.6, or 56 kbps. In addition, Digital Data Service is offered at 19.2 or 64 kbps in the wire centers in Verizon's FCC Tariff No. 1 that are identified in Exhibit A. The actual bit rate is a function of the channel interface selected by the customer. Digital Data Service is further described in Verizon's FCC Tariff No. 1, Sec. 7.2.8 and Verizon's FCC Tariff No. 11, Sec. 7.2.8.

DIGIPATH Digital Service II is a channel for the simultaneous transmission of digital data at the rate of 2.4, 4.8, 9.6, 19.2, 56, or 64 kbps. The actual bit rate is a function of the channel interface selected by the customer. DIGIPATH Digital Service II is further described in Verizon's FCC Tariff No. 11, Sec. 7.2.11.

5. Brief Description of the Dates and Methods of Notice to All Affected Customers (47 C.F.R. § 63.71 (b)(3)):

Verizon sent notices to customers that currently subscribe to the affected services by U.S. Mail on or before August 24, 2016. Copies of the notices are attached as Exhibit B.

Verizon is sending copies of this Application by first class U.S. Mail to the governor and public utilities commission for each affected state as well as to the Special Assistant for Telecommunications to the Secretary of Defense, as required by Section 63.71(a) of the Commission's rules.

6. Regulatory Classification of Carrier (47 C.F.R. § 63.71(b)(4)):

Verizon is classified for regulatory purposes under the Commission's rules as dominant with respect to the services to be discontinued.

CONCLUSION

Verizon respectfully requests that the Commission approve this Application.

Respectfully submitted,



William H. Johnson
Of Counsel

Katharine R. Saunders
Verizon
1320 N. Courthouse Rd.
9th Floor
Arlington, VA 22201
(703) 351-3097 (Office)
(703)-351-3656 (Facsimile)

August 24, 2016

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of August, 2016, I caused to be served a copy of the foregoing Section 63.71 Application by U.S. Mail postage prepaid to the following parties on the attached service list.

A handwritten signature in black ink, reading "Katharine Saunders", with a long horizontal flourish extending to the right.

Katharine R. Saunders

SERVICE LIST

W. Kevin Hughes
Chairman
Maryland Public Service Commission
6 St. Paul Street
16th Floor
Baltimore, MD 21202-6806

Gladys M. Brown
Chairman
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Richard Mroz
President
New Jersey Board of Public Utilities
44 S. Clinton Avenue, 7th Floor
Trenton, NJ 08625

Audrey Zibelman, Chair
New York Public Service Commission
Empire State Plaza
Agency Building 3
Albany, NY 12223-1350

Karen Charles Peterson
Commissioner
Massachusetts Department of
Telecommunications and Cable
1000 Washington Street
Suite 820
Boston, MA 02118

Margaret E. Curran
Chairman
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

James C. Dimitri
Chairman
Virginia State Corporation Commission
Division of Communications
P.O. Box 1197
Richmond, VA 23218

Department of Defense Chief Information
Office
Attn: Military Asst/Mobility Team
The Pentagon
Washington, DC 20301

The Honorable Larry Hogan
Office of the Governor
State House
100 State Circle
Annapolis, MD 21401-1925

The Honorable Tom Wolf
Office of the Governor
508 Main Capitol Building
Harrisburg, PA 17120

The Honorable Chris Christie
Office of the Governor
P.O. Box 001
Trenton, NJ 08625

The Honorable Andrew M. Cuomo
Governor of New York
NYS State Capitol Building
Albany, NY 12224

The Honorable Charlie Baker
Office of the Governor
Room 280
Boston, MA 02133

The Honorable Gina Raimondo
Office of the Governor
82 Smith Street
Providence, RI 02903

The Honorable Terry McAuliffe
Office of the Governor
P.O. Box 1475
Richmond, VA 23218

EXHIBIT A

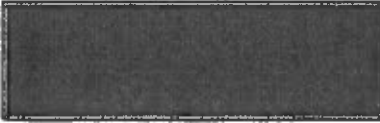
STATE	Wire Center	Verizon Tariff
MA	ASHLAND	FCC 11
MA	DANVERS	FCC 11
MA	DUXBURY	FCC 11
MA	FRAMINGHAM	FCC 11
MA	HOLLISTON	FCC 11
MA	HOPKINTON	FCC 11
MA	LAWRENCE	FCC 11
MA	MARSHFIELD	FCC 11
MA	MEDWAY	FCC 11
MA	MILLIS	FCC 11
MA	NEWTON	FCC 11
MA	TOPSFIELD	FCC 11
MA	WAYLAND	FCC 11
MD	BETHESDA	FCC 1
NJ	BERGEN	FCC 1
NJ	BLOOMFIELD	FCC 1
NJ	COLLINGSWOOD	FCC 1
NJ	CRANFORD	FCC 1
NJ	HACKENSACK	FCC 1
NJ	HADDONFIELD	FCC 1
NJ	JOURNAL SQUARE	FCC 1
NJ	MORRISTOWN	FCC 1
NJ	NEW BRUNSWICK	FCC 1
NY	AVENUE U	FCC 11
NY	EAST 79TH STREET	FCC 11
NY	EAST 97TH STREET	FCC 11
NY	FREEPORT	FCC 11
NY	HEMPSTEAD	FCC 11
NY	LONG BEACH	FCC 11
NY	NEW DORP	FCC 11
NY	SOUTH STATEN ISLAND	FCC 11
NY	WEST 36TH STREET	FCC 11
NY	WEST 42ND STREET	FCC 11
NY	WHITE PLAINS	FCC 11
PA	JENKINTOWN	FCC 1
PA	KIRKLYN	FCC 1
PA	MAYFAIR	FCC 1
PA	MECHANICSBURG	FCC 1
PA	PILGRIM	FCC 1
PA	TULLYTOWN	FCC 1
RI	WASHINGTON ST	FCC 11
VA	COLUMBIA PIKE	FCC 1
VA	FALLS CHURCH	FCC 1
VA	SPRINGFIELD	FCC 1

EXHIBIT B



Verizon
One Verizon Way, VC22W464
Basking Ridge, NJ 07920

August 24, 2016



RE: FCC Service Grandfathering

Dear [REDACTED],

Verizon is upgrading its network to all-fiber in 44 wire centers. These wire centers are listed in Attachment 1.

As part of our network upgrade project, we will be grandfathering a small number of interstate special access services in these 44 wire centers. According to our records, you currently subscribe to one of the services that we intend to grandfather. The services we intend to grandfather are:

Voice Grade Service which provides voice frequency transmission capability in the nominal frequency range of 300 to 3000 Hz. Voice Grade Service is further described in Verizon's FCC Tariff No. 1, Sec. 7.2.3 and Verizon's FCC Tariff No. 11, Sec. 7.2.3.

WATS Access Line Service which provides voice frequency transmission capability for toll free calling in a limited geographic area. WATS Access Line Service is further described in Verizon's FCC Tariff No.1, Sec. 7.2.3.1 and Verizon's FCC Tariff No. 11, Sec. 7.2.10.

Bonded Digital Link Service which provides connecting channels for the transmission of voice or data between an end user's local exchange service and special access service provided by the Verizon local telephone company. Bonded Digital Link Service is further described in Verizon's FCC Tariff No. 1, Sec. 7.2.8.1 and Verizon's FCC Tariff No. 11, Sec. 7.2.21.

Digital Data Service which provides duplex transmission of synchronous serial data at the rate of 2.4, 4.8, 9.6, 56 kbps. In addition, Digital Data Service is offered at speeds of 19.2 and 64 kbps in the wire centers subject to Verizon's FCC No. 1 (see Attachment 1). Digital Data Service is further described in Verizon's FCC Tariff No. 1, Sec. 7.2.8 and Verizon's FCC Tariff No.11, Sec. 7.2.8.

DIGIPATH Digital Service II which provides a channel for the simultaneous transmission of digital data at the rate of 2.4, 4.8, 9.6, 19.2, 56 or 64 kbps. DIGIPATH Digital Service II is further described in Verizon's FCC Tariff No.11, Sec 7.2.11.

On or after November 22, 2016, subject to approval from the FCC, Verizon will stop accepting orders from new customers for these services. As an existing customer, you may continue to receive the services to which you subscribe and to request moves, adds and changes until further notice.

As you review your service needs going forward, we encourage you to consider alternative service options that may better fit your requirements. For example, Verizon offers several alternatives to these services that may provide you with additional features or benefits, including:

- *Wholesale Advantage or Resale*
- *Fiber to the Internet Service*
- *Switched Ethernet Service (TLS)*
- *Private Internet Protocol Service*
- *DS1 Service*
- *Machine-to-Machine Service*

We value your business and look forward to helping you realize the benefits that our advanced offerings can unlock for you. If you have any questions, please contact your account representative.

Sincerely,

Verizon Partner Solutions

On behalf of:

Verizon Maryland LLC
1 East Pratt Street
Baltimore, MD 21202

Verizon New England Inc.
125 High Street
Oliver Tower 7th Floor
Boston, MA 02110

Verizon New Jersey Inc.
540 Broad Street
Newark, NJ 07102

Verizon New York Inc.
140 West Street
New York, NY 10007

Verizon Pennsylvania LLC
1717 Arch Street
Philadelphia, PA 19103

Verizon Virginia LLC
22001 Loudoun County Parkway
Ashburn, VA 20147

FCC Required Notice: The FCC will normally authorize this proposed discontinuance of service (or reduction or impairment) unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 30 days after the Commission releases public notice of the proposed discontinuance. You may file your comments electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the § 63.71 Application of Verizon Maryland LLC; Verizon New England Inc.; Verizon New York Inc.; Verizon New Jersey Inc.; Verizon Pennsylvania LLC; and Verizon Virginia LLC. Comments should include specific information about the impact of this proposed discontinuance (or reduction or impairment) upon you or your company, including any inability to acquire reasonable substitute service.

ATTACHMENT 1

STATE	Wire Center	Verizon Tariff
MA	ASHLAND	FCC 11
MA	DANVERS	FCC 11
MA	DUXBURY	FCC 11
MA	FRAMINGHAM	FCC 11
MA	HOLLISTON	FCC 11
MA	HOPKINTON	FCC 11
MA	LAWRENCE	FCC 11
MA	MARSHFIELD	FCC 11
MA	MEDWAY	FCC 11
MA	MILLIS	FCC 11
MA	NEWTON	FCC 11
MA	TOPSFIELD	FCC 11
MA	WAYLAND	FCC 11
MD	BETHESDA	FCC 1
NJ	BERGEN	FCC 1
NJ	BLOOMFIELD	FCC 1
NJ	COLLINGSWOOD	FCC 1
NJ	CRANFORD	FCC 1
NJ	HACKENSACK	FCC 1
NJ	HADDONFIELD	FCC 1
NJ	JOURNAL SQUARE	FCC 1
NJ	MORRISTOWN	FCC 1
NJ	NEW BRUNSWICK	FCC 1
NY	AVENUE U	FCC 11
NY	EAST 79TH STREET	FCC 11
NY	EAST 97TH STREET	FCC 11
NY	FREEPORT	FCC 11
NY	HEMPSTEAD	FCC 11
NY	LONG BEACH	FCC 11
NY	NEW DORP	FCC 11
NY	SOUTH STATEN ISLAND	FCC 11
NY	WEST 36TH STREET	FCC 11
NY	WEST 42ND STREET	FCC 11
NY	WHITE PLAINS	FCC 11
PA	JENKINTOWN	FCC 1
PA	KIRKLYN	FCC 1
PA	MAYFAIR	FCC 1
PA	MECHANICSBURG	FCC 1
PA	PILGRIM	FCC 1
PA	TULLYTOWN	FCC 1
RI	WASHINGTON ST	FCC 11
VA	COLUMBIA PIKE	FCC 1
VA	FALLS CHURCH	FCC 1
VA	SPRINGFIELD	FCC 1



Verizon
One Verizon Way, VC22W464
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August 24, 2016



RE: FCC Service Grandfathering

Dear Valued Customer,
Account Number: 

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As you review your service needs going forward, we encourage you to consider alternative service options that may better fit your requirements. For example, Verizon offers several alternatives to these services that may provide you with additional features or benefits, including:

- *Fiber-based voice service*
- *Fios Internet Service*
- *Switched Ethernet Service*
- *Private Internet Protocol Service*
- *DS1 Service*
- *Machine-to-Machine Services*

We value your business and look forward to helping you realize the benefits that our advanced offerings can unlock for you.

Sincerely,
Verizon

On behalf of:

Verizon Maryland LLC
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Verizon New England Inc.
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22001 Loudoun County Parkway
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FCC Required Notice: The FCC will normally authorize this proposed discontinuance of service (or reduction or impairment) unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 30 days after the Commission releases public notice of the proposed discontinuance. You may file your comments electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the § 63.71 Application of Verizon Maryland LLC; Verizon New England Inc.; Verizon New York Inc.; Verizon New Jersey Inc.; Verizon Pennsylvania LLC; and Verizon Virginia LLC. Comments should include specific information about the impact of this proposed discontinuance (or reduction or impairment) upon you or your company, including any inability to acquire reasonable substitute service.

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MA	LAWRENCE	FCC 11
MA	MARSHFIELD	FCC 11
MA	MEDWAY	FCC 11
MA	MILLIS	FCC 11
MA	NEWTON	FCC 11
MA	TOPSFIELD	FCC 11
MA	WAYLAND	FCC 11
MD	BETHESDA	FCC 1
NJ	BERGEN	FCC 1
NJ	BLOOMFIELD	FCC 1
NJ	COLLINGSWOOD	FCC 1
NJ	CRANFORD	FCC 1
NJ	HACKENSACK	FCC 1
NJ	HADDONFIELD	FCC 1
NJ	JOURNAL SQUARE	FCC 1
NJ	MORRISTOWN	FCC 1
NJ	NEW BRUNSWICK	FCC 1
NY	AVENUE U	FCC 11
NY	EAST 79TH STREET	FCC 11
NY	EAST 97TH STREET	FCC 11
NY	FREEPORT	FCC 11
NY	HEMPSTEAD	FCC 11
NY	LONG BEACH	FCC 11
NY	NEW DORP	FCC 11
NY	SOUTH STATEN ISLAND	FCC 11
NY	WEST 36TH STREET	FCC 11
NY	WEST 42ND STREET	FCC 11
NY	WHITE PLAINS	FCC 11
PA	JENKINTOWN	FCC 1
PA	KIRKLYN	FCC 1
PA	MAYFAIR	FCC 1
PA	MECHANICSBURG	FCC 1
PA	PILGRIM	FCC 1
PA	TULLYTOWN	FCC 1
RI	WASHINGTON ST	FCC 11
VA	COLUMBIA PIKE	FCC 1
VA	FALLS CHURCH	FCC 1
VA	SPRINGFIELD	FCC 1